

1 Darryl M. Woo (SBN 100513)
dwoo@velaw.com
2 **VINSON & ELKINS LLP**
525 Market Street, Suite 2750
3 San Francisco, CA 94105-2763
Tel: 415.979.6900 / Fax: 415.520-5377

4 Syed K. Fareed (*pro hac vice*)
sfareed@velaw.com
5 Stephen C. Stout (*pro hac vice*)
sstout@velaw.com
6 Andrea M. Houston (*pro hac vice*)
ahouston@velaw.com
7 **VINSON & ELKINS LLP**
8 The Terrace 7
2801 Via Fortuna, Suite 100
9 Austin, TX 78746-7568
10 Tel: 512.542.8400 / Fax: 512.542.8612

11 *Additional attorneys listed on last page
Attorneys for Plaintiff
12 TOMTOM INTERNATIONAL, B.V.

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION
16

17
18 TOMTOM INTERNATIONAL, B.V., ,
19 Plaintiff,
20 v.
21 BROADCOM CORPORATION,
22 Defendant.

Case No. 8:14-cv-00475-PA (DFM)

**PLAINTIFF TOMTOM
INTERNATIONAL, B.V.'S
DEPOSITION DESIGNATIONS
AND BROADCOM
CORPORATION'S OBJECTIONS
AND COUNTER
DESIGNATIONS**

Complaint Filed: March 28, 2014
Trial Date: June 9, 2015

1
2 Dated: May 1, 2015

FENWICK & WEST LLP

3 By: /s/ Todd Gregorian

4 Todd R. Gregorian

5 Attorneys for Plaintiff

6 TOMTOM INTERNATIONAL, B.V.

7 **Plaintiff's attorneys continued:**

8 Jedediah Wakefield (CSB No. 178058)

9 jwakefield@fenwick.com

10 Todd R. Gregorian (CSB No. 236096)

11 tgregorian@fenwick.com

12 Sebastian Kaplan (CSB No. 248206)

13 skaplan@fenwick.com

14 **FENWICK & WEST LLP**

15 555 California Street, 12th Floor

16 San Francisco, CA 94104

17 Tel: 415.875.2300 / Fax: 415.281.1350

18 Bruce L. Ishimatsu (SBN 86145)

19 Bruce.ishimatsu@gmail.com

20 **ISHIMATSU LAW GROUP, P.C.**

21 4712 Admiralty Way, No. 1012

22 Marina del Rey, CA 90292

23 Tel: 310.200.4060 / Fax: 310.496.1540

**PLAINTIFF'S DEPOSITION DESIGNATIONS
WITH DEFENDANT'S OBJECTIONS AND COUNTER-DESIGNATIONS AND
PLAINTIFF'S OBJECTIONS TO DEFENDANT'S COUNTER DESIGNATIONS
AND PLAINTIFF'S CROSS DESIGNATIONS AND DEFENDANT'S OBJECTIONS
TO CROSS DESIGNATIONS**

Code	Objection Key for Deposition Designations (Defendant)
408 Priv.	Compromises or offers to compromise (FRE 408)
A	Argumentative
C	Testimony has been corrected
E	Calls for Expert Opinion
F	Lacks Foundation/Personal Knowledge (FRE 602)
FRCP 32	Inappropriate Use of Deposition Transcript
H	Hearsay (FRE 801 <i>et seq.</i>)
I	Incomplete document or testimony (FRE 106, 403)
L	Leading
Leg.	Calls for Legal Conclusion
P	Unduly prejudicial, probative, wasteful, misleading, confusing, cumulative (FRE 403)
R	Lack of Relevance (FRE 401-402)
V	Vague

Code	Objection Key for Deposition Designations (Plaintiff)
OC	Optional Completeness (Rule 106)
R	Relevance (Rules 401/402)
P	Prejudice, Misleading, Confusion of Issues, Duplicative, and/or Cumulative (Rule 403)
C	Inappropriate Character Evidence (Rules 404-406)
S	Settlement (Rule 408)

F	Foundation
O	Improper Opinion Testimony (Rules 701-702)
703	Relied upon by expert, but otherwise inadmissible (Rule 703)
H	Hearsay (Rule 802)
A	Authenticity (Rule 901)
B	Best Evidence (Rules 1002-1003)
SUM	Improper Summary Evidence (Rule 1006)
M	Subject to Motion <i>in Limine</i> , <i>Daubert</i> Motion, or Motion for Summary Judgment
A/C	Attorney-Client Privilege
T	Not Timely Produced
N	Not Proper Evidence
D	Not Timely or Properly Designated
I	Incomplete
26(a)	Exhibit inadmissible during expert testimony where expert did not disclose document in expert opinion served pursuant to Fed. R. Civ. P. 26(a)(2)(B)
CS	Calls for speculation
CL	Calls for a legal conclusion
IL	Illegible
OS	Outside the scope
ARG	Argumentative

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 9 Lns: 7 - 14					
Pg: 9 Ln: 22 - Pg: 12 Ln: 9					
Pg: 15 Lns: 8 - 12					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 15 Ln: 21 - Pg: 17 Ln: 3					
Pg: 17 Lns: 4 - 8					
Pg: 17 Ln: 16 - Pg: 18 Ln: 23					
Pg: 20 Ln: 23 - Pg: 21 Ln: 3					
Pg: 21 Lns: 4 - 6					
Pg: 21 Lns: 7 - 25					
Pg: 22 Lns: 1 - 17		22:18 – 23:13	No objection		
Pg: 23 Ln: 25 - Pg: 24 Ln: 20					
Pg: 26 Ln: 8 - Pg: 27 Ln: 10					
Pg: 28 Ln: 13 - Pg: 29 Ln: 3					
Pg: 29 Lns: 4 - 7					
Pg: 29 Lns: 8 - 18					
Pg: 29 Ln: 19 - Pg: 30 Ln: 17	F				
Pg: 31 Lns: 1 - 8		31:9 – 32:1	No objection		
Pg: 34 Lns: 7 - 12					
Pg: 34 Ln: 19 - Pg: 35 Ln: 11					
Pg: 35 Lns: 15 - 24		35:25 – 36:8	No objection		
		36:14 – 36:21	No objection		
Pg: 36 Ln: 22 - Pg: 37 Ln: 4					
Pg: 37 Lns: 7 - 21					
Pg: 37 Lns: 24 - 25					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 38 Lns: 6 - 19					
Pg: 38 Ln: 24 - Pg: 39 Ln: 7					
Pg: 40 Lns: 4 - 17					
Pg: 54 Lns: 16 - 19					
Pg: 54 Ln: 21 - Pg: 56 Ln: 4					
Pg: 56 Lns: 5 - 7					
Pg: 56 Ln: 24 - Pg: 57 Ln: 1					
Pg: 57 Lns: 17 - 19					
Pg: 57 Ln: 20 - Pg: 59 Ln: 2					
Pg: 64 Lns: 1 - 8		64:24 – 65:7	No objection		
		65:22 – 66:1	No objection		
Pg: 66 Ln: 2 - Pg: 67 Ln: 15					
Pg: 71 Ln: 20 - Pg: 72 Ln: 4					
Pg: 74 Ln: 11 - Pg: 76 Ln: 23					
Pg: 77 Lns: 4 - 18					
Pg: 77 Ln: 22 - Pg: 78 Ln: 14	Leg; V				
Pg: 78 Ln: 17 - Pg: 79 Ln: 13	Leg; V				
Pg: 81 Lns: 17 - 22					
Pg: 81 Ln: 23 - Pg: 83 Ln: 2					
Pg: 83 Lns: 3 - 6					
Pg: 83 Lns: 10 - 15		83:16 – 83:21	Non-responsive, P		

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 83 Ln: 22 - Pg: 84 Ln: 3					
Pg: 84 Lns: 9 - 20		84:21 – 84:24	No objection		
Pg: 84 Ln: 25 - Pg: 85 Ln: 3					
Pg: 85 Ln: 4 - Pg: 86 Ln: 1					
Pg: 86 Lns: 2 - 21		86:22 – 86:23	Non-responsive, P, ARG		
Pg: 86 Ln: 24 - Pg: 87 Ln: 6					
Pg: 87 Lns: 10 - 12					
Pg: 87 Ln: 17 - Pg: 88 Ln: 5					
Pg: 88 Ln: 6 - Pg: 89 Ln: 4					
Pg: 89 Lns: 14 - 20					
Pg: 89 Lns: 21 - 24					
Pg: 89 Ln: 25 - Pg: 90 Ln: 14					
Pg: 90 Lns: 15 - 17					
Pg: 90 Ln: 21 - Pg: 91 Ln: 13					
Pg: 91 Lns: 16 - 21					
Pg: 92 Lns: 3 - 5		92:6 – 92:18	R, P		
Pg: 99 Lns: 3 - 11					
Pg: 99 Lns: 18 - 21	V; F				
Pg: 99 Ln: 24 - Pg: 100 Ln: 9	V; F				
Pg: 100 Lns: 12 - 19	F				
Pg: 100 Lns: 22 - 25	F				

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 101 Lns: 10 - 19	F				
Pg: 101 Ln: 22 - Pg: 102 Ln: 11	F				
Pg: 102 Lns: 15 - 23					
Pg: 102 Ln: 24 - Pg: 103 Ln: 21					
Pg: 111 Lns: 8 - 13					
Pg: 111 Lns: 16 - 23	R; P				
Pg: 111 Ln: 24 - Pg: 112 Ln: 9	R; P				
Pg: 113 Lns: 3 - 5					
Pg: 113 Lns: 9 - 14					
Pg: 113 Ln: 20 - Pg: 114 Ln: 24					
Pg: 118 Lns: 4 - 6					
Pg: 118 Lns: 13 - 15					
Pg: 118 Lns: 16 - 22		118:23 – 119:23	R, P, H		
Pg: 120 Lns: 8 - 13					
Pg: 122 Ln: 22 - Pg: 123 Ln: 8					
Pg: 123 Lns: 9 - 18					
Pg: 124 Lns: 14 - 22		124:23 – 125:4	R, P		
Pg: 125 Lns: 7 - 11					
Pg: 127 Lns: 7 - 9					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 130 Lns: 16 - 23					
Pg: 131 Lns: 5 - 10					
Pg: 131 Lns: 16 - 17					
Pg: 131 Ln: 24 - Pg: 133 Ln: 15					
Pg: 133 Lns: 16 - 18					
Pg: 133 Ln: 22 - Pg: 134 Ln: 5					
Pg: 134 Ln: 9 - Pg: 135 Ln: 3					
Pg: 135 Lns: 4 - 6					
Pg: 135 Lns: 7 - 11					
Pg: 136 Ln: 14 - Pg: 137 Ln: 4					
Pg: 137 Lns: 5 - 15					
Pg: 138 Lns: 2 - 13					
Pg: 138 Ln: 25 - Pg: 139 Ln: 9		139:13 – 139:22	No objection		
Pg: 139 Ln: 23 - Pg: 140 Ln: 1					
Pg: 140 Lns: 2 - 15					
Pg: 140 Lns: 16 - 24					
Pg: 140 Ln: 25 - Pg: 141 Ln: 8					
Pg: 141 Lns: 9 - 12					
Pg: 141 Ln: 13 - Pg: 142 Ln: 11					
Pg: 142 Lns: 12 - 23					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 143 Lns: 10 - 17					
Pg: 143 Ln: 21 - Pg: 144 Ln: 2					
Pg: 146 Lns: 13 - 24					
Pg: 151 Ln: 15 - Pg: 152 Ln: 19					
Pg: 154 Lns: 17 - 23					
Pg: 155 Ln: 17 - Pg: 156 Ln: 2					
Pg: 159 Ln: 25 - Pg: 160 Ln: 6					
Pg: 160 Lns: 10 - 14					
Pg: 160 Ln: 15 - Pg: 161 Ln: 15					
Pg: 162 Lns: 20 - 22					
Pg: 164 Lns: 8 - 14					
Pg: 164 Lns: 15 - 21					
Pg: 164 Lns: 22 - 23					
Pg: 166 Lns: 6 - 11					
Pg: 166 Lns: 15 - 15					
Pg: 166 Ln: 20 - Pg: 167 Ln: 25					
Pg: 168 Ln: 1 - Pg: 169 Ln: 24					
Pg: 170 Ln: 10 - Pg: 171 Ln: 4	R; P				
Pg: 171 Ln: 13 - Pg: 172 Ln: 5	R; P				

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 172 Lns: 21 - 23	R; P				
Pg: 173 Lns: 1 - 5	R; P; F				
Pg: 176 Lns: 1 - 2					
Pg: 176 Ln: 6 - Pg: 177 Ln: 6					
Pg: 178 Ln: 6 - Pg: 179 Ln: 12					
Pg: 187 Lns: 21 - 22					
Pg: 188 Lns: 20 - 25					
Pg: 189 Lns: 3 - 23					
Pg: 189 Ln: 24 - Pg: 190 Ln: 20					
Pg: 190 Ln: 21 - Pg: 191 Ln: 8					
Pg: 191 Lns: 9 - 23					
Pg: 191 Ln: 24 - Pg: 192 Ln: 2					
Pg: 192 Lns: 3 - 9					
Pg: 192 Lns: 10 - 12					
Pg: 192 Lns: 13 - 15					
Pg: 192 Lns: 16 - 20					
Pg: 192 Lns: 21 - 23					
Pg: 192 Ln: 24 - Pg: 193 Ln: 2					
Pg: 193 Lns: 3 - 5					
Pg: 194 Lns: 9 - 10					
Pg: 194 Lns: 14 - 22					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 195 Lns: 14 - 16					
Pg: 195 Lns: 19 - 25					
Pg: 196 Lns: 4 - 12					
Pg: 196 Lns: 13 - 25					
Pg: 198 Lns: 13 - 21					
Pg: 200 Lns: 20 - 23					
Pg: 201 Lns: 13 - 16					
Pg: 202 Lns: 2 - 12					
Pg: 206 Lns: 7 - 18					
Pg: 206 Lns: 22 - 25					
Pg: 207 Lns: 4 - 11					
Pg: 207 Ln: 23 - Pg: 208 Ln: 10					
Pg: 208 Ln: 19 - Pg: 209 Ln: 3					
Pg: 215 Lns: 5 - 7					
Pg: 215 Lns: 11 - 19					
Pg: 215 Lns: 20 - 20					
Pg: 215 Lns: 21 - 24					
Pg: 216 Lns: 22 - 25					
Pg: 217 Lns: 1 - 4					
Pg: 218 Ln: 13 - Pg: 219 Ln: 16					

Sherry, Paul (Dec. 17, 2014)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 222 Lns: 2 - 6		222:7 – 222:10	R, P		
		222:22 – 223:5	R, P, F		
Pg: 223 Lns: 6 - 10		223:11 – 223:18	P, F		
Pg: 223 Lns: 19 - 21	F				
Pg: 223 Ln: 24 - Pg: 224 Ln: 8	F				
Pg: 226 Lns: 1 - 10					
Pg: 227 Lns: 17 - 20	408 Priv				
Pg: 227 Ln: 25 - Pg: 229 Ln: 21	408 Priv				
Pg: 230 Lns: 13 - 14					
Pg: 230 Ln: 18 - Pg: 231 Ln: 5					
Pg: 231 Ln: 9 - Pg: 232 Ln: 2	F				
Pg: 233 Lns: 8 - 23					
Pg: 234 Ln: 18 - Pg: 235 Ln: 2					

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 8 Ln: 4 - Pg: 9 Ln: 13					
Pg: 9 Lns: 17 - 21					
Pg: 11 Ln: 11 - Pg: 12 Ln: 1					

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 12 Lns: 2 - 19					
Pg: 12 Lns: 23 - 24					
Pg: 13 Lns: 1 - 2					
Pg: 13 Lns: 3 - 3					
Pg: 14 Lns: 1 - 10					
Pg: 14 Lns: 14 - 16					
Pg: 15 Lns: 13 - 15		15:16 – 16:6	No objection		
Pg: 16 Lns: 9 - 13					
Pg: 16 Lns: 18 - 21					
Pg: 22 Lns: 6 - 21	R; P				
Pg: 23 Lns: 14 - 24					
Pg: 24 Ln: 14 - Pg: 25 Ln: 15	F				
Pg: 25 Ln: 16 - Pg: 26 Ln: 14	F				
Pg: 26 Lns: 15 - 25	F				
Pg: 27 Ln: 3 - Pg: 28 Ln: 3	F; R; P				
Pg: 29 Lns: 11 - 20	F				
Pg: 29 Ln: 21 - Pg: 30 Ln: 6	R; P				
Pg: 30 Lns: 9 - 12	F				
Pg: 32 Lns: 18 - 19					
Pg: 32 Ln: 22 - Pg: 33 Ln: 7	F				
Pg: 33 Lns: 9 - 20	F				
Pg: 34 Ln: 16 - Pg: 35 Ln: 23	F	35:24 – 36:8	No objection		

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 36 Ln: 23 - Pg: 37 Ln: 3		38:5 – 38:9	No objection		
Pg: 38 Lns: 19 - 23					
Pg: 39 Lns: 1 - 6		39:7 – 39:13	Non-responsive		
Pg: 39 Ln: 14 - Pg: 40 Ln: 1					
Pg: 40 Lns: 4 - 23	L				
Pg: 41 Lns: 1 - 3					
Pg: 41 Lns: 18 - 21					
Pg: 43 Lns: 6 - 13		43:14 – 43:18	No objection		
Pg: 43 Lns: 19 - 23		43:24 – 44:8	CS		
Pg: 44 Lns: 9 - 12					
Pg: 46 Lns: 5 - 9					
Pg: 47 Lns: 6 - 14	R; P				
Pg: 47 Lns: 17 - 25	R; P				
Pg: 48 Lns: 3 - 3					
Pg: 48 Lns: 17 - 23	R; P				
Pg: 49 Lns: 8 - 13		49:14 – 49:18	No objection		
Pg: 52 Ln: 11 - Pg: 53 Ln: 2		53:15 – 53:17	I		
Pg: 53 Ln: 18 - Pg: 54 Ln: 9					
Pg: 54 Lns: 10 - 23					
Pg: 54 Ln: 24 - Pg: 55 Ln: 24	C				
Pg: 56 Lns: 16 - 20					

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 58 Ln: 16 - Pg: 59 Ln: 10	R; P	59:11 – 59:23	No objection		
Pg: 59 Ln: 24 - Pg: 60 Ln: 7		60:19 – 60:22	No objection		
Pg: 60 Ln: 23 - Pg: 61 Ln: 1	R; P				
Pg: 65 Lns: 7 - 19					
Pg: 66 Lns: 7 - 10	R; P				
Pg: 66 Lns: 15 - 17	R; P				
Pg: 66 Ln: 18 - Pg: 67 Ln: 5	R; P				
Pg: 67 Lns: 19 - 23	R; P				
Pg: 67 Lns: 24 - 25	R; P				
Pg: 69 Lns: 5 - 13	C				
Pg: 70 Ln: 22 - Pg: 72 Ln: 6					
Pg: 72 Ln: 9 - Pg: 73 Ln: 8					
Pg: 73 Lns: 11 - 17	C				
Pg: 73 Ln: 22 - Pg: 74 Ln: 5	R; P				
Pg: 75 Ln: 18 - Pg: 76 Ln: 18	R; P				
Pg: 77 Ln: 23 - Pg: 78 Ln: 11	R; P				
Pg: 87 Ln: 3 - Pg: 89 Ln: 22	R; P				
Pg: 89 Ln: 23 - Pg: 90 Ln: 2	R; P				
Pg: 90 Lns: 3 - 12	R; P				
Pg: 90 Lns: 15 - 18	R; P				
Pg: 91 Lns: 10 - 14					
Pg: 91 Ln: 23 - Pg: 92 Ln: 2					

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 92 Lns: 14 - 17		92:18 – 92:25			
Pg: 93 Lns: 1 - 4					
Pg: 95 Ln: 23 - Pg: 96 Ln: 1					
Pg: 96 Lns: 5 - 13					
Pg: 100 Ln: 22 - Pg: 102 Ln: 10					
Pg: 107 Lns: 19 - 23	V; F				
Pg: 107 Ln: 24 - Pg: 108 Ln: 6					
Pg: 109 Ln: 25 - Pg: 110 Ln: 12	R; P				
Pg: 116 Ln: 14 - Pg: 118 Ln: 8	R; P				
Pg: 118 Lns: 9 - 12					
Pg: 118 Ln: 13 - Pg: 119 Ln: 11	R; P	119:12 – 119:19	R, P, CS		
Pg: 119 Ln: 20 - Pg: 120 Ln: 12		120:13 – 121:3	P, H (121:4 – 121:25)	121:4 – 121:25	F; H
Pg: 122 Ln: 1 - Pg: 123 Ln: 16	R; P				
Pg: 126 Lns: 12 - 21					
Pg: 127 Ln: 22 - Pg: 128 Ln: 2					
Pg: 131 Ln: 22 - Pg: 132 Ln: 22					
Pg: 133 Ln: 17 - Pg: 134 Ln: 14	F				
Pg: 134 Lns: 16 - 16	F				

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 135 Lns: 12 - 25	R; P				
Pg: 136 Lns: 7 - 10	R; P	136:11 – 136:16	No objection		
Pg: 137 Lns: 17 - 23					
Pg: 138 Lns: 2 - 11					
Pg: 138 Ln: 14 - Pg: 139 Ln: 11					
Pg: 140 Lns: 4 - 8		140:9 - 140:14	No objection		
Pg: 140 Ln: 18 - Pg: 141 Ln: 9					
Pg: 141 Lns: 12 - 24					
Pg: 142 Ln: 25 - Pg: 143 Ln: 9					
Pg: 143 Lns: 19 - 20					
Pg: 143 Ln: 22 - Pg: 144 Ln: 5					
Pg: 150 Lns: 19 - 24		151:23 – 152:3	I		
Pg: 152 Lns: 4 - 8		152:14 – 153:16	Non-responsive, P		
Pg: 153 Ln: 17 - Pg: 156 Ln: 14					
Pg: 156 Lns: 18 - 18					
Pg: 156 Ln: 24 - Pg: 158 Ln: 13		158:22 – 159:7	F, P (158:14 – 158:21)	158:14 – 158:21	
Pg: 159 Lns: 14 - 16					
Pg: 159 Lns: 19 - 24		159:25 – 160:9	I, OC (160:10 – 160:13)	160:10 - 160:13	

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
		160:14 – 160:18	I, OC (160:10 – 160:13)	160:10 – 160:13	
Pg: 163 Lns: 2 - 24					
Pg: 165 Lns: 15 - 25		166:22 – 167:8	I, OC (167:9 – 167:14)	167:9 – 167:14	F; calls for speculation
Pg: 170 Lns: 5 - 8		170:9 – 170:17	P, Non-responsive (170:14 – 170:17)		
Pg: 172 Ln: 14 - Pg: 173 Ln: 13					
Pg: 173 Lns: 16 - 20					
Pg: 179 Lns: 4 - 15					
Pg: 179 Ln: 16 - Pg: 180 Ln: 10					
Pg: 180 Ln: 14 - Pg: 181 Ln: 23					
Pg: 191 Ln: 1 - Pg: 192 Ln: 1					
Pg: 192 Ln: 19 - Pg: 194 Ln: 5	F				
Pg: 194 Lns: 7 - 7	F				
Pg: 194 Lns: 9 - 10	F				
Pg: 210 Lns: 3 - 6					
Pg: 210 Lns: 7 - 10	V				
Pg: 210 Lns: 13 - 14	V				
Pg: 214 Lns: 5 - 13					
Pg: 214 Ln: 16 - Pg: 215 Ln: 1					

Abraham, Charles (Jan. 28, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 218 Lns: 3 - 8		218:9 – 218:25	No objection		
Pg: 219 Lns: 1 - 24					

Diggelen, Frank van (Mar. 11, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 7 Lns: 8 - 12					
Pg: 7 Lns: 13 - 22					
Pg: 8 Lns: 17 - 20					
Pg: 9 Lns: 6 - 24					
Pg: 10 Lns: 12 - 18					
Pg: 16 Ln: 9 - Pg: 17 Ln: 5					
Pg: 17 Lns: 12 - 13					
Pg: 18 Lns: 20 - 21					
Pg: 18 Ln: 24 - Pg: 19 Ln: 7					
Pg: 19 Ln: 10 - Pg: 20 Ln: 3		20:4 – 20:9	R, P		
Pg: 20 Lns: 10 - 11					
Pg: 20 Lns: 14 - 14		20:20 – 21:3	No objection		
Pg: 22 Lns: 1 - 10					
Pg: 22 Ln: 19 - Pg: 23 Ln: 18					
Pg: 25 Lns: 8 - 16					
Pg: 28 Ln: 13 - Pg: 30 Ln: 3		30:4 – 30:21	R, P		
Pg: 36 Lns: 9 - 10					
Pg: 36 Lns: 11 - 13					
Pg: 36 Lns: 17 - 20					
Pg: 37 Lns: 9 - 21					
Pg: 44 Lns: 2 - 5					

Diggelen, Frank van (Mar. 11, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 44 Lns: 11 - 17					
Pg: 44 Lns: 20 - 23					
Pg: 46 Ln: 18 - Pg: 47 Ln: 2					
Pg: 50 Lns: 7 - 19					
Pg: 67 Lns: 3 - 7					
Pg: 72 Lns: 9 - 17					
Pg: 72 Ln: 19 - Pg: 73 Ln: 14					
Pg: 74 Lns: 20 - 22					
Pg: 74 Ln: 24 - Pg: 75 Ln: 9		75:14 – 76:1	No objection		
Pg: 87 Ln: 17 - Pg: 88 Ln: 2					
Pg: 97 Lns: 19 - 21					
Pg: 97 Ln: 23 - Pg: 98 Ln: 1					
Pg: 101 Lns: 17 - 20	V				
Pg: 101 Lns: 22 - 25	V	102:23 – 103:10	No objection		
Pg: 112 Lns: 9 - 16	L; V				
Pg: 125 Lns: 16 - 21					
Pg: 126 Ln: 22 - Pg: 127 Ln: 12					
Pg: 146 Lns: 14 - 16	V; F				
Pg: 146 Ln: 18 - Pg: 147 Ln: 15	V; F				
Pg: 147 Ln: 18 - Pg: 148 Ln: 6	F				

Diggelen, Frank van (Mar. 11, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 156 Lns: 7 - 9	F				
Pg: 159 Lns: 18 - 20					
Pg: 160 Lns: 1 - 3					
Pg: 165 Lns: 9 - 22					
Pg: 168 Ln: 9 - Pg: 169 Ln: 14					
Pg: 169 Lns: 16 - 18					
Pg: 170 Ln: 25 - Pg: 171 Ln: 3					
Pg: 171 Ln: 5 - Pg: 172 Ln: 6					
Pg: 172 Lns: 9 - 23					
Pg: 172 Ln: 25 - Pg: 173 Ln: 8		173:15 – 173:22	R, P, OC (173:9 – 173:14)	173:9 – 173:14	
Pg: 178 Lns: 8 - 17					
Pg: 178 Lns: 20 - 20					
Pg: 180 Lns: 3 - 14					
Pg: 180 Ln: 18 - Pg: 181 Ln: 1	F				
Pg: 181 Lns: 15 - 15					
Pg: 181 Lns: 18 - 23		181:24 – 183:21 183:24 – 184:3	Non-responsive (182:2 – 184:3)		
Pg: 184 Lns: 4 - 9					
Pg: 184 Lns: 12 - 22					
Pg: 184 Ln: 25 - Pg: 185 Ln: 3		189:5 – 190:4	R, P		

Diggelen, Frank van (Mar. 11, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 190 Lns: 5 - 15					
Pg: 193 Lns: 3 - 5	F				
Pg: 193 Lns: 7 - 10	F				
Pg: 193 Lns: 12 - 13	F				
Pg: 202 Ln: 23 - Pg: 203 Ln: 3					
Pg: 203 Lns: 7 - 10	F; I; V				
Pg: 203 Lns: 13 - 25	I; F; V				
Pg: 204 Lns: 2 - 19	F; I; V				
Pg: 204 Ln: 22 - Pg: 205 Ln: 6	V; F				
Pg: 205 Ln: 10 - Pg: 206 Ln: 14	V; F				
Pg: 206 Ln: 17 - Pg: 207 Ln: 16	I; V; F	207:18 – 207:18	No objection		
Pg: 207 Ln: 22 - Pg: 208 Ln: 14		208:15 – 209:16	Non-responsive (208:19 – 209:16)		
Pg: 209 Lns: 17 - 20		209:22 – 211:3 211:4 – 211:23	P, Non-responsive, ARG		
Pg: 211 Ln: 24 - Pg: 212 Ln: 4		212:5 – 212:16	P, Non-responsive, ARG		
Pg: 218 Lns: 7 - 12	V				
Pg: 219 Ln: 23 - Pg: 220 Ln: 1		220:2 – 220:11	R, P		
Pg: 220 Lns: 12 - 14					

Diggelen, Frank van (Mar. 11, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 220 Ln: 17 - Pg: 221 Ln: 1		221:2 – 221:22	R, P		
Pg: 241 Lns: 2 - 5		241:5 – 241:23	No objection		
Pg: 242 Lns: 2 - 5					
Pg: 243 Lns: 20 - 24		244:8 – 245:10	R, P		
Pg: 278 Ln: 21 - Pg: 280 Ln: 16					
Pg: 280 Lns: 17 - 18					
Pg: 280 Ln: 20 - Pg: 281 Ln: 6		281:6 – 282:18	R, P		
Pg: 282 Ln: 19 - Pg: 283 Ln: 1					
Pg: 291 Lns: 5 - 15					
Pg: 291 Ln: 16 - Pg: 293 Ln: 2					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 7 Lns: 12 - 24					
Pg: 8 Ln: 24 - Pg: 10 Ln: 1					
Pg: 10 Lns: 14 - 23					
Pg: 12 Lns: 14 - 22					
Pg: 13 Lns: 1 - 5					

¹ Broadcom asserts a global objection to all of Mr. Rivera's deposition designations pursuant to Rule 32.

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 15 Ln: 11 - Pg: 16 Ln: 3					
Pg: 16 Lns: 10 - 11					
Pg: 16 Ln: 15 - Pg: 17 Ln: 17					
Pg: 20 Lns: 18 - 22					
Pg: 22 Ln: 22 - Pg: 23 Ln: 4					
Pg: 23 Lns: 12 - 14					
Pg: 23 Lns: 16 - 19					
Pg: 23 Lns: 21 - 24					
Pg: 24 Lns: 2 - 2					
Pg: 26 Ln: 1 - Pg: 27 Ln: 2					
Pg: 27 Lns: 21 - 24					
Pg: 28 Lns: 7 - 14					
Pg: 28 Lns: 19 - 21					
Pg: 29 Lns: 12 - 20					
Pg: 29 Lns: 22 - 24					
Pg: 30 Lns: 8 - 19					
Pg: 30 Lns: 21 - 23					
Pg: 30 Ln: 25 - Pg: 31 Ln: 5					
Pg: 31 Lns: 8 - 10					
Pg: 34 Lns: 15 - 16					
Pg: 34 Lns: 18 - 19					
Pg: 34 Ln: 21 - Pg: 35 Ln: 3					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 35 Ln: 6 - Pg: 36 Ln: 1					
Pg: 36 Lns: 3 - 12					
Pg: 36 Ln: 18 - Pg: 37 Ln: 23	R; P				
Pg: 37 Ln: 25 - Pg: 38 Ln: 1	R; P				
Pg: 43 Lns: 3 - 12	R; P				
Pg: 43 Lns: 15 - 17	R; P				
Pg: 47 Ln: 22 - Pg: 48 Ln: 1					
Pg: 48 Lns: 19 - 21					
Pg: 48 Ln: 24 - Pg: 49 Ln: 10					
Pg: 49 Ln: 25 - Pg: 50 Ln: 1	R; P; E; I				
Pg: 50 Lns: 4 - 9	E; R; P; I				
Pg: 50 Lns: 14 - 20	E; R; P; I				
Pg: 50 Ln: 23 - Pg: 51 Ln: 18	R; P; E; I				
Pg: 51 Lns: 21 - 21	I; R; P; E				
Pg: 52 Lns: 8 - 10					
Pg: 52 Lns: 13 - 21					
Pg: 53 Lns: 10 - 13					
Pg: 55 Lns: 6 - 17					
Pg: 55 Lns: 20 - 22					
Pg: 58 Ln: 21 - Pg: 59 Ln: 8					
Pg: 59 Ln: 10 - Pg: 61 Ln: 13					
Pg: 63 Lns: 9 - 17	E; F				

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 63 Ln: 20 - Pg: 64 Ln: 9	E; F				
Pg: 65 Lns: 4 - 8	F; E				
Pg: 65 Lns: 10 - 12	E; F				
Pg: 65 Ln: 14 - Pg: 66 Ln: 3	F; E				
Pg: 66 Lns: 6 - 13	E; F				
Pg: 66 Lns: 18 - 19					
Pg: 66 Lns: 21 - 21					
Pg: 70 Ln: 12 - Pg: 71 Ln: 25	F; E; R; P				
Pg: 72 Lns: 4 - 4	E; F				
Pg: 72 Lns: 6 - 19	F; E; R; P				
Pg: 72 Lns: 21 - 23	E; F; R; P				
Pg: 72 Ln: 25 - Pg: 73 Ln: 13	F; E; R; P				
Pg: 73 Lns: 16 - 21	R; P; F; E				
Pg: 75 Ln: 24 - Pg: 76 Ln: 5	R; P; F; E				
Pg: 77 Lns: 1 - 3	R; P				
Pg: 77 Lns: 6 - 6	R; P				
Pg: 78 Lns: 11 - 21	R; P				
Pg: 78 Ln: 24 - Pg: 79 Ln: 4	R; P				
Pg: 79 Lns: 7 - 13	R; P				
Pg: 79 Ln: 15 - Pg: 80 Ln: 6	R; P				
Pg: 80 Lns: 8 - 14	R; P				
Pg: 80 Lns: 16 - 22	R; P				

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 81 Ln: 7 - Pg: 83 Ln: 3	R; P				
Pg: 84 Ln: 19 - Pg: 85 Ln: 4	E				
Pg: 85 Lns: 7 - 10	E				
Pg: 85 Lns: 12 - 17	E				
Pg: 86 Lns: 5 - 22	E; R; P				
Pg: 93 Ln: 3 - Pg: 94 Ln: 13	E				
Pg: 95 Lns: 23 - 25					
Pg: 96 Lns: 2 - 13					
Pg: 101 Ln: 5 - Pg: 102 Ln: 3					
Pg: 102 Lns: 7 - 17					
Pg: 102 Lns: 19 - 23					
Pg: 103 Lns: 1 - 3					
Pg: 111 Ln: 7 - Pg: 112 Ln: 1	E; R; P				
Pg: 112 Lns: 4 - 18	R; P; F; E				
Pg: 112 Ln: 21 - Pg: 113 Ln: 4	R; P; F; E				
Pg: 113 Lns: 7 - 18	R; P; I; E				
Pg: 113 Lns: 21 - 22	R; P; F; E				
Pg: 113 Ln: 24 - Pg: 115 Ln: 3					
Pg: 115 Lns: 6 - 10	F				
Pg: 115 Lns: 23 - 25	F				
Pg: 116 Lns: 9 - 15					
Pg: 118 Lns: 2 - 10					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 119 Ln: 22 - Pg: 120 Ln: 2					
Pg: 120 Lns: 5 - 7					
Pg: 120 Lns: 9 - 14					
Pg: 120 Lns: 17 - 19					
Pg: 120 Lns: 21 - 25					
Pg: 122 Lns: 8 - 16					
Pg: 123 Lns: 3 - 8					
Pg: 124 Lns: 3 - 23					
Pg: 125 Ln: 5 - Pg: 126 Ln: 5					
Pg: 134 Lns: 4 - 12					
Pg: 135 Ln: 9 - Pg: 136 Ln: 6					
Pg: 137 Lns: 5 - 8					
Pg: 137 Ln: 15 - Pg: 139 Ln: 6					
Pg: 139 Lns: 9 - 21					
Pg: 139 Ln: 24 - Pg: 140 Ln: 9					
Pg: 141 Ln: 16 - Pg: 143 Ln: 15	E; R; P				
Pg: 143 Lns: 19 - 20	E				
Pg: 143 Ln: 22 - Pg: 144 Ln: 2	E; R; P				
Pg: 144 Ln: 4 - Pg: 145 Ln: 2	E; R; P				
Pg: 145 Lns: 5 - 6	E; R; P				
Pg: 149 Lns: 9 - 14					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 150 Lns: 10 - 20					
Pg: 156 Lns: 6 - 15					
Pg: 158 Lns: 6 - 25					
Pg: 161 Ln: 25 - Pg: 162 Ln: 3					
Pg: 162 Lns: 15 - 22					
Pg: 162 Ln: 25 - Pg: 163 Ln: 13					
Pg: 163 Ln: 17 - Pg: 164 Ln: 9	V; F				
Pg: 164 Lns: 13 - 22	F; V				
Pg: 166 Ln: 23 - Pg: 169 Ln: 25	R; F; E				
Pg: 170 Lns: 20 - 24					
Pg: 171 Ln: 17 - Pg: 172 Ln: 17					
Pg: 174 Ln: 22 - Pg: 175 Ln: 24					
Pg: 176 Lns: 15 - 24	F; R; P				
Pg: 179 Lns: 6 - 8	V				
Pg: 179 Lns: 11 - 17	V				
Pg: 179 Ln: 19 - Pg: 180 Ln: 19					
Pg: 181 Lns: 6 - 13					
Pg: 182 Lns: 5 - 10					
Pg: 182 Lns: 19 - 22					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 183 Ln: 1 - Pg: 185 Ln: 15					
Pg: 185 Lns: 17 - 18					
Pg: 185 Ln: 20 - Pg: 186 Ln: 12					
Pg: 187 Lns: 9 - 21		188:20 – 189:1	P, O		
Pg: 189 Lns: 2 - 15					
Pg: 189 Lns: 18 - 21		189:23 – 190:1	P, O, CL, Non-responsive		
Pg: 191 Lns: 14 - 16					
Pg: 191 Ln: 20 - Pg: 193 Ln: 10					
Pg: 194 Lns: 11 - 21					
Pg: 195 Ln: 2 - Pg: 197 Ln: 11					
Pg: 197 Ln: 14 - Pg: 198 Ln: 7					
Pg: 208 Lns: 10 - 13					
Pg: 208 Lns: 15 - 15					
Pg: 208 Ln: 17 - Pg: 209 Ln: 24					
Pg: 210 Lns: 7 - 10					
Pg: 210 Lns: 13 - 16					
Pg: 211 Lns: 17 - 22		211:23 – 212:16	P, CS, Non-responsive		
Pg: 212 Lns: 4 - 14					
Pg: 212 Lns: 17 - 19					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 217 Lns: 7 - 9	R; P				
Pg: 217 Lns: 11 - 11	R; P				
Pg: 217 Ln: 13 - Pg: 218 Ln: 4	R; P				
Pg: 220 Lns: 21 - 23	R; P				
Pg: 224 Ln: 24 - Pg: 226 Ln: 17	R; P				
Pg: 227 Lns: 11 - 20	R; P	227:21 – 228:4	No objection		
Pg: 228 Lns: 12 - 15	R; P				
Pg: 232 Lns: 15 - 17					
Pg: 232 Lns: 19 - 19					
Pg: 232 Lns: 21 - 24					
Pg: 233 Ln: 19 - Pg: 234 Ln: 8					
Pg: 234 Ln: 18 - Pg: 235 Ln: 20	R; P				
Pg: 235 Lns: 23 - 25					
Pg: 236 Lns: 9 - 14					
Pg: 237 Lns: 15 - 18					
Pg: 238 Lns: 2 - 16					
Pg: 239 Ln: 8 - Pg: 240 Ln: 8	R; P				
Pg: 245 Ln: 10 - Pg: 246 Ln: 8	I; F				
Pg: 246 Ln: 10 - Pg: 247 Ln: 10					
Pg: 247 Lns: 14 - 16					

Rivera, Walter John (Mar. 16, 2015)¹					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 249 Lns: 4 - 6					
Pg: 249 Lns: 8 - 8					
Pg: 249 Lns: 10 - 24					
Pg: 250 Lns: 1 - 4					

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 7 Lns: 3 - 7					
Pg: 7 Lns: 10 - 15					
Pg: 7 Lns: 16 - 16					
Pg: 7 Ln: 20 - Pg: 8 Ln: 18					
Pg: 9 Ln: 12 - Pg: 10 Ln: 11					
Pg: 10 Ln: 15 - Pg: 11 Ln: 3					
Pg: 13 Lns: 9 - 13					
Pg: 17 Lns: 8 - 18					
Pg: 17 Lns: 20 - 21					
Pg: 18 Lns: 4 - 10					
Pg: 18 Lns: 23 - 25					
Pg: 19 Lns: 2 - 9					
Pg: 19 Lns: 11 - 14	V; R; P				

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 19 Lns: 16 - 20					
Pg: 20 Ln: 19 - Pg: 21 Ln: 17					
Pg: 22 Ln: 22 - Pg: 23 Ln: 21					
Pg: 24 Lns: 4 - 7					
Pg: 24 Ln: 13 - Pg: 25 Ln: 1					
Pg: 26 Lns: 12 - 14					
Pg: 26 Lns: 17 - 18					
Pg: 26 Lns: 20 - 24					
Pg: 28 Lns: 4 - 23					
Pg: 29 Lns: 4 - 13					
Pg: 29 Lns: 16 - 19		30:2 – 30:17	H, P		
Pg: 30 Lns: 18 - 23					
Pg: 31 Lns: 15 - 20					
Pg: 31 Ln: 22 - Pg: 32 Ln: 4		32:9 – 32:14	CS, H, P		
Pg: 32 Lns: 15 - 18					
Pg: 39 Lns: 8 - 23	R; P	39:24 – 40:5	No objection		
Pg: 40 Lns: 23 - 25					
Pg: 41 Lns: 2 - 3					
Pg: 45 Ln: 23 - Pg: 46 Ln: 8	R; P; F				
Pg: 46 Lns: 10 - 15	F; R; P				
Pg: 46 Ln: 17 - Pg: 47 Ln: 4					
Pg: 47 Lns: 9 - 21					

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 47 Ln: 23 - Pg: 48 Ln: 7	V				
Pg: 48 Lns: 9 - 11	V; R; P				
Pg: 48 Ln: 18 - Pg: 49 Ln: 11	R; P; F				
Pg: 49 Lns: 17 - 21	R; P				
Pg: 51 Lns: 8 - 11					
Pg: 51 Lns: 13 - 15					
Pg: 51 Ln: 19 - Pg: 52 Ln: 24		53:17 – 54:13	CS, P, O		
Pg: 55 Lns: 15 - 16	V				
Pg: 55 Lns: 18 - 25	R; P; V				
Pg: 56 Lns: 2 - 5					
Pg: 56 Lns: 7 - 8					
Pg: 59 Ln: 21 - Pg: 60 Ln: 4	R; P				
Pg: 63 Lns: 4 - 13	R; P; V				
Pg: 63 Lns: 18 - 21	V				
Pg: 63 Ln: 24 - Pg: 64 Ln: 1					
Pg: 64 Lns: 2 - 10	E				
Pg: 64 Lns: 12 - 12					
Pg: 64 Lns: 16 - 17	V; E				
Pg: 64 Ln: 20 - Pg: 65 Ln: 2	R; P; V				
Pg: 65 Lns: 4 - 5					
Pg: 65 Ln: 13 - Pg: 66 Ln: 2					
Pg: 71 Lns: 18 - 23					

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 72 Lns: 2 - 4					
Pg: 73 Lns: 16 - 17					
Pg: 73 Lns: 20 - 23	R; P				
Pg: 73 Lns: 25 - 25					
Pg: 75 Lns: 14 - 16					
Pg: 75 Ln: 19 - Pg: 76 Ln: 3					
Pg: 76 Lns: 5 - 7					
Pg: 77 Ln: 25 - Pg: 78 Ln: 11	R; P; E; V	78:12 – 78:14	No objection		
Pg: 78 Lns: 15 - 25	R; P; E				
Pg: 79 Lns: 2 - 6	E; R; P				
Pg: 79 Lns: 8 - 12	R; P; E				
Pg: 80 Ln: 23 - Pg: 81 Ln: 1	H				
Pg: 81 Lns: 5 - 25	R; P				
Pg: 82 Ln: 6 - Pg: 83 Ln: 11	R; P; E				
Pg: 83 Lns: 13 - 22	E; R; P				
Pg: 84 Lns: 3 - 5	V; F				
Pg: 84 Lns: 7 - 10					
Pg: 84 Lns: 13 - 14					
Pg: 84 Ln: 24 - Pg: 85 Ln: 1					
Pg: 85 Lns: 3 - 3					
Pg: 85 Lns: 10 - 12	R; P				
Pg: 85 Lns: 14 - 17	R; P				

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 85 Lns: 20 - 20	R; P				
Pg: 86 Lns: 1 - 4	R; P; F				
Pg: 86 Lns: 7 - 11	R; P; E				
Pg: 86 Lns: 13 - 18	V				
Pg: 86 Ln: 22 - Pg: 87 Ln: 5	R; P; E				
Pg: 87 Lns: 7 - 12	A				
Pg: 87 Lns: 14 - 14					
Pg: 87 Lns: 18 - 20	A; R; P; V				
Pg: 87 Ln: 23 - Pg: 88 Ln: 1	V; E; R; P				
Pg: 88 Lns: 4 - 5					
Pg: 89 Lns: 4 - 7					
Pg: 89 Lns: 20 - 21					
Pg: 89 Lns: 23 - 23					
Pg: 91 Lns: 9 - 19					
Pg: 95 Lns: 4 - 19	R; P; V				
Pg: 103 Lns: 16 - 19	V				
Pg: 103 Lns: 21 - 24	V				
Pg: 107 Lns: 20 - 25					
Pg: 108 Lns: 5 - 18	R; P				
Pg: 108 Ln: 24 - Pg: 109 Ln: 5	R; P; V				
Pg: 109 Lns: 7 - 8					
Pg: 109 Lns: 11 - 15	V; R; P; E				

Vilaysack, Phonebandith (Mar. 27, 2015)					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 109 Ln: 21 - Pg: 110 Ln: 2	R; P; V				
Pg: 110 Lns: 5 - 6	V; R; P				
Pg: 110 Ln: 10 - Pg: 111 Ln: 5	V				
Pg: 115 Lns: 6 - 7					
Pg: 115 Lns: 11 - 18					
Pg: 116 Lns: 2 - 11	V; R; P; A				
Pg: 116 Lns: 14 - 16					
Pg: 116 Ln: 23 - Pg: 117 Ln: 16	V; F				
Pg: 117 Lns: 19 - 24					
Pg: 118 Lns: 8 - 14	V; R; P				
Pg: 124 Lns: 4 - 5					
Pg: 124 Lns: 9 - 19					
Pg: 125 Ln: 25 - Pg: 126 Ln: 2	R; P; V				
Pg: 126 Lns: 4 - 9	V; R; P				
Pg: 126 Ln: 11 - Pg: 127 Ln: 1	R; P; V				
Pg: 127 Lns: 3 - 15	V; R; P				
Pg: 127 Lns: 17 - 17					

Najarian, Richard (Jan. 22, 2015)²		
--	--	--

² Broadcom asserts a global objection to all of Mr. Najarian's deposition designations pursuant to Rule 32.

Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 8 Ln: 7 - Pg: 9 Ln: 7					
Pg: 9 Lns: 21 - 25					
Pg: 10 Ln: 3 - Pg: 11 Ln: 12					
Pg: 11 Ln: 15 - Pg: 12 Ln: 13					
Pg: 12 Lns: 16 - 23					
Pg: 12 Ln: 25 - Pg: 13 Ln: 23					
Pg: 16 Lns: 2 - 19					
Pg: 16 Ln: 23 - Pg: 19 Ln: 8					
Pg: 20 Lns: 7 - 17					
Pg: 20 Ln: 21 - Pg: 21 Ln: 1					
Pg: 21 Lns: 5 - 11					
Pg: 21 Ln: 25 - Pg: 22 Ln: 18					
Pg: 22 Ln: 23 - Pg: 23 Ln: 14					
Pg: 24 Lns: 7 - 13					
Pg: 27 Lns: 6 - 11					
Pg: 29 Lns: 23 - 25					
Pg: 30 Lns: 4 - 8	H				
Pg: 30 Ln: 10 - Pg: 31 Ln: 21	V; R; P				
Pg: 32 Ln: 19 - Pg: 33 Ln: 19					
Pg: 34 Lns: 6 - 14	R; P				
Pg: 34 Ln: 23 - Pg: 35 Ln: 7					
Pg: 36 Lns: 12 - 15	V				

Najarian, Richard (Jan. 22, 2015)²					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 36 Ln: 17 - Pg: 37 Ln: 7	V				
Pg: 37 Ln: 8 - Pg: 38 Ln: 22	V				
Pg: 38 Ln: 23 - Pg: 39 Ln: 1	V				
Pg: 39 Lns: 3 - 15	V				
Pg: 39 Ln: 16 - Pg: 42 Ln: 16	V				
Pg: 42 Lns: 17 - 20	V				
Pg: 42 Ln: 23 - Pg: 43 Ln: 10	V				
Pg: 52 Lns: 12 - 15	V; R; P				
Pg: 53 Ln: 18 - Pg: 55 Ln: 24	V; R; P				
Pg: 55 Ln: 25 - Pg: 58 Ln: 2	V; H; R; P				
Pg: 59 Lns: 17 - 19					
Pg: 59 Lns: 22 - 25					
Pg: 60 Ln: 14 - Pg: 61 Ln: 5		60:1 – 60:13	P		
Pg: 61 Ln: 23 - Pg: 62 Ln: 4		61:6 – 61:22	P, H		
Pg: 64 Ln: 18 - Pg: 67 Ln: 7	V; H				
Pg: 67 Ln: 17 - Pg: 68 Ln: 1	R; P	68:2 – 68:13	No objection		
Pg: 68 Lns: 14 - 16		68:2 – 68:13	No objection		
		69:11 – 69:16	No objection		
Pg: 68 Lns: 19 - 24					
Pg: 71 Lns: 1 - 11	V; R; P	71:12 – 71:20	R, P, CS		
Pg: 72 Lns: 3 - 5	R; P				
Pg: 72 Ln: 9 - Pg: 73 Ln: 11	R; P				

Najarian, Richard (Jan. 22, 2015)²					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 76 Ln: 21 - Pg: 77 Ln: 6	V; R; P				
Pg: 81 Ln: 17 - Pg: 82 Ln: 22	R; P				
Pg: 83 Lns: 6 - 14	R; P				
Pg: 91 Ln: 9 - Pg: 94 Ln: 2					
Pg: 94 Lns: 19 - 25					
Pg: 95 Lns: 3 - 10					
Pg: 109 Ln: 2 - Pg: 111 Ln: 2					
Pg: 113 Lns: 15 - 19					
Pg: 113 Lns: 23 - 23					
Pg: 114 Ln: 8 - Pg: 115 Ln: 13	R; P				
Pg: 115 Lns: 14 - 23					
Pg: 116 Ln: 8 - Pg: 119 Ln: 4	R; P				
Pg: 119 Lns: 5 - 9					
Pg: 119 Lns: 10 - 20		119:21 – 120:17	H		
		122:17 – 123:4	H		
		123:5 – 123:18	No objection		
Pg: 126 Lns: 3 - 20					
Pg: 127 Lns: 8 - 13					
Pg: 128 Lns: 9 - 14	R; P				
Pg: 128 Ln: 17 - Pg: 130 Ln: 4	R; P				
Pg: 132 Ln: 4 - Pg: 133 Ln: 2	R; P	133:3 – 133:8	R, P		

Najarian, Richard (Jan. 22, 2015)²					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 134 Lns: 12 - 18					
Pg: 138 Lns: 17 - 19					
Pg: 144 Lns: 2 - 7	R; P				
Pg: 148 Ln: 8 - Pg: 149 Ln: 2	R; P				
Pg: 149 Lns: 5 - 14	R; P				
Pg: 166 Lns: 3 - 17	R; P				
Pg: 166 Ln: 18 - Pg: 167 Ln: 1	R; P				
Pg: 167 Lns: 11 - 24	R; P				
Pg: 168 Ln: 20 - Pg: 169 Ln: 12	R; P				
Pg: 169 Lns: 15 - 21	R; P				
Pg: 172 Lns: 3 - 16					
Pg: 172 Ln: 21 - Pg: 174 Ln: 15					
Pg: 174 Lns: 18 - 23					
Pg: 175 Lns: 15 - 17					
Pg: 176 Lns: 9 - 11					
Pg: 177 Ln: 17 - Pg: 178 Ln: 15					
Pg: 179 Ln: 23 - Pg: 180 Ln: 1		180:2 – 180:20	No objection		
Pg: 180 Ln: 21 - Pg: 182 Ln: 1		182:2 – 183:13	P, CS, Non-responsive (183:14 – 184:13)	183:14 – 184:13	F; calls for speculation
Pg: 184 Ln: 17 - Pg: 185 Ln: 5					

Najarian, Richard (Jan. 22, 2015)²					
Plaintiff's Designations	Defendant's Objections	Defendant's Counter-Designations	Plaintiff's Objections to Counter Designations	Plaintiff's Cross-Designations	Defendant's Objections to Cross-Designations
Pg: 186 Lns: 3 - 21					
Pg: 191 Lns: 18 - 23					
Pg: 193 Ln: 24 - Pg: 194 Ln: 11					
Pg: 194 Ln: 16 - Pg: 196 Ln: 9	408 Priv				
Pg: 196 Lns: 11 - 12					
Pg: 196 Lns: 15 - 23					
Pg: 196 Ln: 25 - Pg: 197 Ln: 1	408 Priv				
Pg: 197 Lns: 6 - 7	408 Priv				